

1 (4) 1983 to date: Dennis Egnatz, M.D., 121 Lakewood
2 Circle, Burr Ridge, Illinois 60521.

3 INTERROGATORY NO. 35:

4 Please state the name, address, title and dates of employ-
5 ment of the immediate superior(s) of the individuals identified
6 in the preceding interrogatory.

7 RESPONSE:

8 From 1944 to February, 1981, the Medical Director reported
9 to the corporate Vice President of Personnel and Industrial Rela-
10 tions. From 1981 to the present, the Medical Director has re-
11 ported to the corporate Vice President of Human Resources.

12 INTERROGATORY NO. 36:

13 Please describe in detail the duties and responsibilities of
14 the defendant's chief medical officer.

15 RESPONSE:

16 The Medical Director directs company-wide employee health
17 and safety programs. He provides guidance to corporate manage-
18 ment. The Medical Director's position is administrative and his
19 responsibilities include employee health, safety, industrial
20 hygiene, loss prevention, and employee assistance. He directly
21 supervises a staff of non-medical personnel and functionally
22 supervises occupational health nurses throughout the company. He
23 also approves the appointment of, and coordinates the activities
24 of, independent medical practitioners conducting physical exami-
25 nations or providing medical care locally.

26 INTERROGATORY NO. 37:

27 Please state the names and addresses of all physicians em-
28 ployed, retained or otherwise engaged by the defendant at any of